

**UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH,  
Individually and as Parent and Legal  
Guardian of W.W., K.W., G.W., and  
L.W., minor children, and  
MATTHEW WADSWORTH,

Plaintiffs,

v.

WALMART, INC. and JETSON  
ELECTRIC BIKES, LLC,

Defendants.

Case No.: 2:23-cv-00118-NDF

JURY TRIAL DEMANDED

---

**PLAINTIFFS' AFFIDAVIT IN SUPPORT OF MOTION  
FOR ADMISSION TO APPEAR PRO HAC VICE**

Pursuant to Superior Court Civil Rule 84.2(b) the undersigned requests permission to appear *pro hac vice* and participate in this litigation on behalf of the Plaintiffs. In support of this request, the undersigned counsel affirms the following:

1. I, Eitan Goldrosen, am an attorney with Morgan and Morgan, P.A., 20 N. Orange Avenue, Suite 1600, Orlando, FL 32801, Email: [egoldrosen@forthepeople.com](mailto:egoldrosen@forthepeople.com), telephone number (321) 361-3537.

2. I have been admitted to practice in the following courts:

**State Courts:**

Florida State Court, Admitted 11/23/2020.

**U.S. District Courts:**

U.S.D.C. for the Middle District of Florida - Admitted 04/12/2023.

U.S.D.C. for the Southern District of Florida - Admitted 04/04/2023.

3. No written disciplinary proceedings have ever been brought against me by any disciplinary authority in any jurisdiction. I have never been publicly sanctioned by any court.

4. I affirm that I will comply with and be bound by the Local Rules of the United States District Court for the District of Wyoming.

5. I acknowledge that local counsel, Taly Goody, is required to be fully prepared to represent the client at any time, in any capacity.

6. I acknowledge and submit to being subject to the disciplinary jurisdiction of the Court for any alleged misconduct arising in the course of preparation and representation in the proceedings.

ACCORDINGLY, Plaintiff respectfully submits this Affidavit in support of the Motion for Admission for Eitan Goldrosen to appear *pro hac vice*.

Date: August 4, 2023

Respectfully Submitted,

/s/ Eitan Goldrosen, Esq.\*

**Eitan Goldrosen, Esq.**

Florida Bar No. 1025140

**MORGAN & MORGAN, P.A.**

20 N. Orange Ave., Suite 1600

Orlando, FL 32801

Telephone: (407) 420-1414

Primary Email:

[egoldrosen@forthepeople.com](mailto:egoldrosen@forthepeople.com)

Secondary Email:

[csmaya@forthepeople.com](mailto:csmaya@forthepeople.com)

**TALY GOODY, ESQ.**

Wyoming Bar No.: 8-6737

**GOODY LAW GROUP**

58 Malaga Cove Plaza

Palos Verdes Estates, CA 90274

Telephone: (310) 893-1983

Primary Email:

[Taly@GoodyLawGroup.com](mailto:Taly@GoodyLawGroup.com)

**T. MICHAEL MORGAN, ESQ.\***

Florida Bar No.: 062229

**MORGAN & MORGAN, P.A.**

20 N. Orange Ave., Suite 1600

Orlando, FL 32801

Telephone: (407) 420-1414

Primary Email:

[mmorgan@forthepeople.com](mailto:mmorgan@forthepeople.com)

Secondary Email:

[akelseyflowers@forthepeople.com](mailto:akelseyflowers@forthepeople.com)

*\*Pro Hac Vice Pending*

*Counsel for the Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 4, 2023, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Taly Goody  
Taly Goody